

March 3, 2003

Reference: NPRM : "Special Operating Rules for the Conduct of IFR RNAV Operations Using GPS in Alaska"

Federal Aviation Administration
400 7th St. S. W. PL-401
Washington, D.C. 20590

Dear Federal Aviation Administration,

This semester of college I am taking Aviation Law, Aviation Safety and Technology Systems in Society. Through the knowledge I have gained from these classes I have become interested in the Notice of Proposed Rulemaking (FAA-2003-14305). As an instrument rated pilot with 250 hours I find it very interesting to hear the position that Alaskan pilots are faced with. Their lives are jeopardized by the unsafe routines they are asked to follow each time they fly. Through my instrument training I became very familiar with GPS and have seen first hand the benefits it provides in VFR weather, and especially IFR weather.

The facts are that the number of pilots and aircraft in Alaska surpasses almost every other state. Additionally, the accident rate is 2.5 times greater than other states, due to mid-air collisions, flight into terrain and weather related. Many parts of the state are restricted by weather minimums, and when the weather drops below VFR, travel cannot take place. Due to the lack of ground based navigational systems in Alaska, the number of registered pilots, the number of registered aircraft and the number of mid-air collisions it seems like something should have been done to solve this problem years ago. It is true that safety takes money, but this seems like a problem that is worth spending a little money on.

With the implementation of additional GPS approaches and approved GPS routes, not only would many parts of Alaska be more readily accessible in IFR weather, but VFR weather as well. Since many parts of the state are only reachable by airplane the increased frequency of flight would increase business and productivity in Alaska. With an increased number of approved routes, GPS waypoints and GPS instrument approaches the number of accidents due to mid-air collisions would be reduced. Since not every pilot would be flying the same route, time after time, there would be less chances that two airplanes would meet in inclement or good weather.

GPS has been a growing trend in the United States due to the lower costs than the soon to be outdated NDB's and more common VOR's. By helping out the pilots of Alaska, making the air above safer, they can also test out the GPS navigation systems to better serve the other 49 states.

Respectfully,

Liesl Kummer